

July 27, 1995

TO: John Glynn

THROUGH: Kevin Fitzpatrick

FROM: Pam Elardo

SUBJECT: Recommendation for Notice of Violation, Holnam, Inc.

INTRODUCTION:

Holnam, Inc. manufactures Portland cement along the Duwamish River approximately one mile south of the mouth of the river in Elliott Bay. The facility discharges storm water and non-contact cooling water through 5 outfalls to the Duwamish River.

On November 28, 1994, Holnam was issued NPDES permit No. WA-000223-2 which regulated the discharge of non-contact cooling water through outfalls 002 and 003 and storm water through outfalls 004, 005, and 006. The NPDES permit restricts the discharge from outfalls 004, 005 and 006 according to Special Condition S1A as follows:

EFFLUENT LIMITATIONS		
<u>Parameter</u>	<u>Average Monthly</u>	<u>Maximum Daily</u>
TSS	15 lbs/day	50 mg/L
pH	6.5 to 9.0 std units	
Turbidity	Not more than 10 NTU over background when background turbidity is 50 NTU or less; and not more than 20 percent over background when background is greater than 50 NTU	
Oil and grease	10 mg/L	15 mg/L

In addition, Special condition S2. of the permit requires monitoring for TSS, pH and turbidity twice monthly, and for oil and grease on a monthly basis.



#### FINDINGS OF FACT:

Holnam has violated effluent limitations and monitoring requirements set forth in NPDES Permit No. WA-000223-2 from outfall 004, 005, and 006 as evident from discharge monitoring report submittals. The dates and level of effluent violations are attached to this memorandum.

In addition, Holnam has failed to sample according to Special Condition S2. Holnam only sampled outfall 004 once for TSS in the months of February, March, April and May, 1995.

Holnam only sampled outfall 005 once for TSS in the months of January, February, March, April and May, 1995.

Holnam only sampled outfall 006 once for TSS in the months of January, February, March, April and May, 1995.

Holnam also failed to monitor background turbidity for the months of January and February, 1995.

#### RECOMMENDATION:

Holnam, Inc should be issued a Notice of violation for the above NPDES permit violations. After Holnam responds to the NOV, we should consider issuing a Notice of Penalty in the amount of \$25,000 as calculated by the gravity penalty matrix.

Holnam, Inc. Violation Summary						
		Date of Violation				
Outfall	Units	Jan-95	Feb-95	Mar-95	Apr-95	May-95
<b>Outfall 004:</b>						
TSS ave	lbs/day	71	30.6		34	20
TSS max	mg/L	730	430	130	620	210
Turbidity- bkgd	NTU			2.6	2.6	3.0
Turbidity	NTU			43	165	137
O&G ave	mg/L	46				
O&G max	mg/L	90				
pH max	std units				10.82	
<b>Outfall 005:</b>						
TSS ave	lbs/day	17.4			17	
TSS max	mg/L	520	350	100	440	60
Turbidity- bkgd	NTU			2.6	2.6	3.0
Turbidity	NTU			86	270	83
pH max	std units				10.0	
<b>Outfall 006:</b>						
TSS ave	lbs/day			20.8		
TSS max	mg/L	400	240	360		
Turbidity- bkgd	NTU			2.6	2.6	2.6
Turbidity	NTU			370	140	38